

September 23, 2016

Submitted via CFTC Portal

Division of Market Oversight
U.S. Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

Re: ICAP SEF (US) LLC – Regulation 40.6 Rule Certification

Ladies and Gentlemen:

Pursuant to Section 5c(c) of the Commodity Exchange Act (the “Act”) and Section 40.6(a) of the regulations of the Commodity Futures Trading Commission (the “Commission”), ICAP SEF (US) LLC (“ICAP SEF”) hereby notifies the Commission that it has amended its Rulebook, specifically Rules 309, 401, 405, 406 and 407. The Rulebook has been amended to remove reference to LCH.Clearnet LLC, which no longer clears swaps executed on ICAP SEF, to revise Rules 401 and 405 at the request of the Commission, and to add certain additional disruptive trading practices and other general offences that are expressly prohibited by ICAP SEF.

A concise explanation and analysis of the amendments to the Rulebook and their compliance with applicable provisions of the Act and the Commission’s regulations thereunder is attached hereto as Exhibit A. A clean copy of the amended Rulebook exclusive of confidential Chapter 9 is attached hereto as Exhibit B and a copy of the Rulebook exclusive of confidential Chapter 9 marked to show changes against the version submitted to the Commission in ICAP-2016-R-6 is attached hereto as Exhibit C.

The amendments will become effective on October 10, 2016. ICAP SEF certifies that the amendments comply with the requirements of the Commodity Exchange Act and the rules and regulations promulgated thereunder. ICAP SEF has reviewed the swap execution facility core principles (“Core Principles”) as set forth in the Commodity Exchange Act and has determined that the amendments impact the Core Principles identified in Exhibit A.

ICAP SEF is not aware of any substantive opposing views expressed with respect to this filing and certifies that, concurrent with this filing, a copy of this submission was posted on the ICAP SEF website and may be accessed at: <http://www.icap.com/what-we-do/global-broking/sef.aspx>.

Please contact the undersigned at (212) 341-9193 with any questions regarding this matter.

Very truly yours,



Gregory Compa
Chief Compliance Officer

ICAP SEF (US) LLC
1100 Plaza Five
Jersey City, NJ 07311

Exhibit A

Explanation and Analysis

1. Rule 309 has been amended to remove reference to LCH.Clearnet LLC, which no longer clears swaps executed on ICAP SEF.

The amendment is consistent with Core Principle 7.

2. At the request of the Commission following its recent analysis of disruptive trading/fraud and manipulation provisions contained in all registered SEF rulebooks, Rule 401 has been revised to clarify that the Rule prohibits making, or attempting to make, untrue or misleading statements and engaging, or attempting to engage, in any manipulative device or artifice, in addition to the existing prohibitions.

The amendments are consistent with Core Principle 2.

3. At the request of the Commission following its recent analysis of disruptive trading/fraud and manipulation provisions contained in all registered SEF rulebooks, Rule 405 has been revised to clarify that attempted manipulation of the price of Contracts is also prohibited, in addition to actual manipulation of such prices.

The amendments are consistent with Core Principle 2.

4. The SEF has determined to reorganize and enhance the offenses previously listed in Rules 406 and 407 to provide greater clarity and guidance to Participants. Rule 406 has been replaced with a new Rule governing disruptive trading practices. Rule 406 now sets forth with specificity types of disruptive trading practices that are prohibited, and existing Rule 402(c), which also governed certain types of disruptive trading practices, has been moved to Rule 406(b) so all such conduct is governed by the same Rule. The previous Rule 406 has been moved to revised Rule 407 and included as part of an expanded list of general offenses. These general offenses are now more closely aligned with trading standard violations traditionally prohibited on designated contract markets.

The amendments are consistent with Core Principle 2 and Commission Regulation 37.203.